

who are released will subsequently commit more crimes. We must prevent this from occurring as we will be unable to keep up with this high likelihood of repeat offenses.

5. I believe the offenders who remain in the jail should not be released without an individual judicial risk assessment balancing the alleged risk of harm to the offender due to COVID-19 versus the risk of harm to public safety if released. Moreover, consideration of other alternatives such as testing and isolation of positive inmates within the jail or the opening of another stand-alone jail facility should be considered before releasing these inmates.
6. I would respectfully urge the Court to require a process which is transparent, includes all of the aforementioned considerations and includes measures for testing inmates for COVID-19 to avoid spreading the virus unwittingly by releasing infected individuals out of a controlled and isolated environment. I would urge the Court to review alternatives to a mass release of dangerous persons as requested by this lawsuit, such as activating a stand-alone jail facility for isolation purposes. The type of drastic measures requested by the Plaintiffs in this lawsuit should not be granted without first considering all other options.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my ability.



Derick Miller
Chief of Police
Carrollton Police Department

March 31, 2020